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Attorneys for Defendants,
CITY OF LOS ANGELES,
LOS ANGELES POLICE DEPARTMENT, and
LOS ANGELES BOARD OF POLICE COMMISSIONERS

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

GARRY MATTHEWS and DOMINIC)	Case No.: 22-cv-02944-FLA-PD
ROSS HUNN, individually and as class)	
representatives,)	STIPULATION PURSUANT TO LOCAL RULE
)	7-1 REGARDING THE CITY OF LOS
Plaintiffs,)	ANGELES'S MOTION TO DISMISS AND THE
vs.)	SCHEDULING CONFERENCE
)	
CITY OF LOS ANGELES, LOS)	
ANGELES POLICE DEPARTMENT,)	
AND LOS ANGELES BOARD OF)	Action Filed: 05/03/2022
POLICE COMMISSIONERS,)	
)	
Defendants.)	
)	
)	
)	
)	

1 Pursuant to Local Rule 7-1, Plaintiffs and the City of Los Angeles (the “City”),
2 through their attorneys of record, enter into the following stipulation regarding the City’s
3 previously filed motion to dismiss:

4 Whereas, on June 16, 2022, the City filed a motion to dismiss the Plaintiffs’
5 Complaint (ECF Nos. 23-24), which is scheduled to be heard on July 29, 2022;

6 Whereas, given the hearing date for the City’s motion to dismiss, the Court set a
7 Scheduling Conference for the same date, July 29, 2022, at 1:00 p.m.

8 Whereas, on or about June 23, 2022, the United States Supreme Court issued a
9 decision in *New York State Rifle & Pistol Association, Inc. et al. v. Bruen Superintendent*
10 *of New York State Police, et al.*, wherein the United States Supreme Court held that New
11 York State’s “proper cause” requirement to obtain a license to carry a handgun outside
12 the home is unconstitutional;

13 Whereas, on June 27, 2022, the parties met and conferred regarding the impact of
14 that decision on this case;

15 Whereas, the parties have agreed that the City will withdraw its presently filed
16 motion to dismiss (ECF Nos. 23-24), and will file a new motion to dismiss;

17 NOW THEREFORE, for judicial economy, the parties stipulate as follows:

- 18 1. The City’s motion to dismiss (ECF Nos. 23-24) shall be withdrawn;
- 19 2. The City shall file a new motion to dismiss the Complaint no later than August
20 1, 2022;
- 21 3. Plaintiffs shall file their response to the motion to dismiss no later than
22 September 12, 2022.
- 23 4. The City shall file its reply in support of the motion to dismiss or otherwise
24 respond to Plaintiffs’ response no later than September 30, 2022.
- 25 5. The City’s motion to dismiss will be heard on October 14, 2022, at 1:30 p.m.,
26 or another date convenient for the Court.
- 27 6. The Scheduling Conference, previously set for July 29, 2022, is rescheduled
28 for October 14, 2022 at 1:00 p.m., or another date convenient for the Court.

1 Accordingly, the parties respectfully request that the Court adopt the proposed
2 order granting the stipulation described herein.

3
4 Dated: July 5, 2022

OFFICE OF THE CITY ATTORNEY OF LOS
ANGELES

6 By:

7 /s/ Benjamin Chapman

8 Benjamin Chapman

9 Attorneys for Defendants,
10 CITY OF LOS ANGELES,
11 LOS ANGELES POLICE DEPARTMENT,
12 and LOS ANGELES BOARD OF POLICE
COMMISSIONERS

13
14 Dated: July 5, 2022

LAW OFFICE OF JOVAN BLACKNELL

16 By:

17 /s/ Jovan Blacknell

18 Jovan Blacknell

19
20 Attorneys for Plaintiffs

21
22 Dated: July 5, 2022

LAW OFFICE OF WILLIAM CLAIBORNE

25 By:

26 /s/ William Claiborne

27 William Claiborne
28

Attorneys for Plaintiffs

Pursuant to Local Rule 5-4.3.4(a)(2)(i), all signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.